

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD FOR
PUERTO RICO, as representative of

No. 17-BK-3283-LTS

THE COMMONWEALTH OF PUERTO
RICO

IN RE: THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD FOR
PUERTO RICO, as representative of

No. 17-BK-4780-LTS

THE PUERTO RICO ELECTRIC POWER
AUTHORITY

THE SPECIAL CLAIMS COMMITTEE OF
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO, ACTING BY AND THROUGH ITS
MEMBERS,

No. 19-AP-388-LTS

and

THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

as co-trustees of

THE PUERTO RICO ELECTRIC POWER
AUTHORITY

v.

INSPECTORATE AMERICA
CORPORATION, et al.,

**DEFENDANTS VITOL INC. & VITOL S.A.'S INFORMATIVE MOTION & REQUEST
TO BE HEARD AT DECEMBER 11-12 OMNIBUS HEARING**

PLEASE TAKE NOTICE that, pursuant to this Court's Order Regarding Procedures for Attendance, Participation, and Observation of December 11–12, 2019, Omnibus Hearing, Vitol Inc. ("VIC") and Vitol S.A. ("VSA") respectfully state as follows:

1. Michael C. Kelso of Susman Godfrey LLP will appear on behalf of VIC in Courtroom 17C of the Daniel Patrick Moynihan Courthouse, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007. Andrés W. López of The Law Offices of Andrés W. López will appear on behalf of VSA in Courtroom 3 in the United States District Court for the District of Puerto Rico, 150 Carlos Chardon Street, Federal Building, San Juan, Puerto Rico 00918.

2. Mr. Kelso and Mr. López request to be heard on behalf of VIC and VSA on the Motion to Stay Adversary Proceeding filed by the Special Claims Committee for the Financial Oversight and Management Board for Puerto Rico in the adversary proceeding styled *Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico et al. v. Inspectorate America Corp. et al.*, ECF 38, Case No. 19-ap-388, the Objection to the Special Claims Committee's Motion to Stay Adversary Proceeding filed by VIC and VSA in that same adversary proceeding (ECF 46) and all related papers.

3. Mr. Kelso and Mr. López reserve the right to be heard on any matter raised by any party at the December 11–12, 2019, Omnibus Hearing that concerns VIC and VSA and that relates to the Title III cases, any adversary proceeding pending in the Title III Cases, or any other matter raised at the Omnibus Hearing.

Date: December 6, 2019

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

This certifies that on December 6, 2019, the following counsel of record have been served a copy of the foregoing document through the Court's CM/ECF service:

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This further certifies that on December 6, 2019, the United States Trustee for Region 21 was served a copy of this document by United States Priority Mail at the address below.

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s/ Andrés W. López
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